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*Counsel for Plaintiffs Andrea Hollingsworth, A.R.H., and A.D.H.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ANDREA HOLLINGSWORTH, an individual; A.R.H., a minor by and through her legal guardian and/or parent, Andrea Hollingsworth; and A.D.H., a minor by and through her legal guardian and/or parent, Andrea Hollingsworth,

Plaintiffs

vs.

CITY OF NORTH LAS VEGAS, Nevada, a Municipal Corporation; Jacqueline Gravatt, in her official capacity as Chief of the North Las Vegas Police Department; MICHAEL L. ROSE, an individual; ERIC SPANNBAUER, an individual; DOES I – X,

Defendants

Case. No.: 2:21-cv-2230-CDS-NJK

**Order Granting Request to  
Extend Stay for Thirty Days**

COME NOW Defendants North Las Vegas Police Department Chief JACQUELINE GRAVATT, and Officers MICHAEL L. ROSE, and ERIC SPANNBAUER (“Defendants”), by and through their counsel, Robert W. Freeman, Esq., Frank A. Toddre,

1 II, Esq., and E. Matthew Freeman, Esq., of LEWIS BRISBOIS BISGAARD & SMITH, LLP,  
 2 and Plaintiffs ANDREA HOLLINGSWORTH, A.R.H., and A.D.H. (“Plaintiffs”), by and  
 3 through their counsel, Margaret A. McLetchie, Esq., and Leo S. Wolpert, Esq., of  
 4 MCLEATCHIE LAW, and Brittany Shrader, Esq., of the NATIONAL ASSOCIATION OF  
 5 THE DEAF (hereinafter “the Parties”), and hereby submit their Joint Status Report as  
 6 required by this Court’s order (ECF No. 114.)

7 The Parties are in the process of pursuing resolution, but because of the complexity  
 8 of the issues present in this matter and due to Counsel for both Parties’ continuing  
 9 unavoidable familial obligations referenced in the Joint Motion to Stay and previous status  
 10 report (ECF Nos. 109 and 113), and two recent deaths in the family of Ms. McLetchie (July  
 11 26, 2024) and Mr. Wolpert (May 17, 2024), the Parties have not had sufficient time to  
 12 dedicate towards resolution. Counsel for Defendants’ family obligations referenced in the  
 13 Joint Motion to Stay continue to have required time out of the jurisdiction, and will continue  
 14 to do so for the foreseeable future.<sup>1</sup> Counsel for Plaintiffs has had to spend significant time  
 15 out of the office to address family estate matters and has an out of town memorial service on  
 16 September 21, 2024.

17 The parties understand that this request is an extraordinary one, but counsel has  
 18 also had extraordinary personal and professional burdens, and believe a stay is warranted to  
 19 avoid unnecessary work with the parties.

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 28 <sup>1</sup> At the pleasure of the Court, counsel for Defendants is willing to provide more  
 information regarding his family obligations.

Should the parties not reach resolution by October 3, 2024, they propose the following schedule:

Deadline	Date
Initial Expert Disclosures	November 15, 2024
Rebuttal Expert Disclosures	December 16, 2024
Discovery Cutoff	January 17, 2024 ✓
Dispositive Motions	February 17, 2024 ✓

Dated this 4<sup>th</sup> day of September, 2024.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Robert W. Freeman

ROBERT W. FREEMAN

Nevada Bar No. 3062

E. MATTHEW FREEMAN

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Las Vegas, Nevada 89118

*Attorney for Defendants*

Dated this 4<sup>th</sup> day of September 2024.

MCLEATCHIE LAW

/s/ Margaret A. McLetchie

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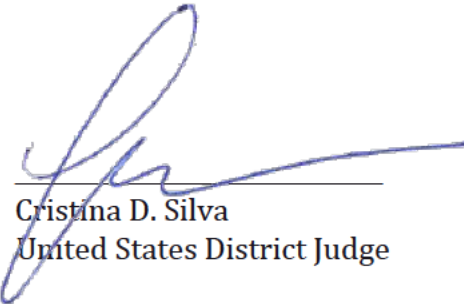
*Attorneys for Plaintiffs*

**ORDER**

Based on the representation of counsel, the request to extend the stay is GRANTED, nunc pro tunc, to the date of their request. The parties are ordered to file a joint status report addressing the status of settlement negotiations by October 3, 2024. If the parties fail to resolve their dispute by October 3, the scheduling order is modified as follows:

Initial Experts:	November 15, 2024
Rebuttal Experts:	December 16, 2024
Discovery Cut off:	January 17, 2025
Dispositive Motions:	February 17, 2025
Joint Pretrial Order:	March 17, 2025, or 30 days after the resolution of dispositive motions, or further court order.

Dated: September 2024

  
Cristina D. Silva  
United States District Judge